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14 *Counterclaim-Plaintiff LifeCore*
15 *Fitness, Inc.*

16
17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**
19

20 Woodway USA, Inc.

21 Plaintiff,

22 v.

23 LifeCORE Fitness, Inc. d/b/a
24 Assault Fitness,

25 Defendant.

Case No. 22-cv-492-JO-BLM

**RESPONSIVE CLAIM
CONSTRUCTIONS AND
IDENTIFICATIONS OF EXTRINSIC
EVIDENCE OF DEFENDANT,
LIFECORE FITNESS**

1 Pursuant to the Court's Scheduling Order, (Dkt. No. 40) and Patent L.R. 4.1(c)
2 and (d), Defendant and Counterclaim-Plaintiff, LifeCORE Fitness, Inc. d/b/a Assault
3 Fitness ("LifeCORE") submits the responsive claim constructions and
4 identifications of extrinsic evidence attached as Exhibit A.¹

6 LifeCORE reserves the right to amend or supplement these responsive claim
7 constructions and identifications of extrinsic evidence, whether based on the receipt
8 and analysis of Woodway's disclosure of same, conferences between the parties
9 during the claim construction process, discovery or investigation, or otherwise.

11 Dated: January 5, 2023

Respectfully Submitted,

13 /s/ Rebecca J. Cantor

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24 *Counterclaim-Plaintiff LifeCore Fitness,*
25 *Inc.*

26 ¹ The parties agree that the term "substantially corresponds" should be construed
27 according to its plain and ordinary meaning.
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RESPONSIVE CLAIM CONSTRUCTIONS AND IDENTIFICATIONS OF EXTRINSIC EVIDENCE OF DEFENDANT, LIFECORE FITNESS

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/s/ Rebecca J. Cantor

Exhibit A to LifeCore's Responsive Claim Constructions and Identification of Extrinsic Evidence

Term (Patent(s))	Woodway's Proposed Construction	Woodway's Extrinsic Evidence	LifeCore's Proposed Construction	LifeCore's Extrinsic Evidence
shaft ('580, '884, '745, and '005)	Plain and ordinary meaning, such as: hollow or solid element/part/rod/tube/member/piece that transmits power or motion or is capable of transmitting power or motion.	<p>Shaft, DICTIONARY OF MECHANICAL ENGINEERING (1999) at 346.</p> <p>Shaft, THE AMERICAN HERITAGE COLLEGE DICTIONARY (4th ed. 2004) at 1272.</p> <p>Shaft, WEBSTER'S II NEW COLLEGE DICTIONARY (3rd ed. 2005) at 1037.</p> <p>Shaft, MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS (5th ed., 1994) at 804.</p> <p>Shaft, IEEE STANDARD DICTIONARY OF ELECTRICAL AND</p>	a rotating element used to transmit power from one part to another	<p>Shafts: Definition, Types, And Application Engineering Choice (LCF002182-93)</p> <p>What is Shaft: Definition, Types, and Applications (LCF002234-41)</p> <p>A Complete Guide To Shafts: What They Are, Different Types and Uses (LCF002134-45)</p> <p>Shaft (mechanical engineering) (LCF2178-81)</p> <p>Shafts: Definition, Types, Application, Materials, Size, Used, Design, Advantages & Disadvantages - Engineering Learn (LCF2194-202)</p>

Exhibit A to LifeCore's Responsive Claim Constructions and Identification of Extrinsic Evidence

		ELECTRONICS TERMS (3rd ed. 1984) at 829.		Mechanical Design of a Shaft - S.B.A. Invent (LCF002157- 77) What is shaft? Definition Types Material slidingmotion (LCF002242-59)
substantially prevent rotation, substantially prevent, substantially prevents, substantially prevented, substantially preventing ('580, '884, '745, and '005)	Plain and ordinary meaning, such as: entirely/largely/ /mostly/generally though not necessarily entirely.		allow minimal rotation (or movement) before preventing any further rotation (or movement)	
safety device ('884, '745, and '005)	A device that permits movement in only one direction.		device having two ring-shaped components	
safety device ('580)	A device that permits movement in only one direction.		means plus function; corresponding structures disclosed at 27:7-29:28	
bearing rail(s) ('580)	Plain and ordinary meaning, such as: a rail with bearings.		structure supported by frame	

Exhibit A to LifeCore's Responsive Claim Constructions and Identification of Extrinsic Evidence

Coupled ('580, '884, '745, and '005)	The joining of two members directly or indirectly to one another.	<i>Chapco, Inc. and Samsara Fitness, LLC v. Woodway USA, Inc.</i> , Case No. 3:15-cv-1665 (JHC), Dkt. 76 (D. Conn. Dec. 8, 2016).	connected directly	<p>Coupled - definition of coupled by The Free Dictionary (LCF002154-56)</p> <p>What does coupled mean? (LCF002228-33)</p> <p>Coupled - Definition, Meaning & Synonyms Vocabulary.com (LCF002151-53)</p>
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